

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 18-16907
Victor H. Maia	:	Chapter 11
	:	Judge Jean K. FitzSimon
Debtor(s)	:	*****
	:	
Wells Fargo Bank, N.A.	:	
	:	
	:	Movant,
vs	:	
	:	
Victor H. Maia	:	
Celeste Maia	:	
	:	
Respondents.	:	

**WELLS FARGO BANK, N.A.'S NOTICE OF DEBTOR'S REQUEST FOR
FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Wells Fargo Bank, N.A. ("Creditor") by and through undersigned counsel, hereby submits Notice to the Court of Victor H. Maia ("Debtor") request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor has requested a forbearance period of 3 months and has elected to not tender payments to Creditor that would have come due on the mortgage starting April 1, 2020 through June 1, 2020, and will resume payments beginning July 1, 2020. Creditor holds a secured interest in the real property commonly known as 79 Redwood Drive, Northampton, PA 18067. Creditor filed a proof of claim as claim number 14.

Creditor does not waive any rights to collect the payments that come due during the forbearance period. Debtor will be required to cure the delinquency created by the forbearance period. If Debtor fails to make arrangements to fully cure any arrears resulting from the

forbearance period, Creditor reserves the ability to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

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Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is kvelter@manleydeas.com

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Wells Fargo Bank, N.A.	:	
	:	Movant,
vs	:	
	:	
Victor H. Maia	:	
Celeste Maia	:	
	:	
	:	
	:	
	:	Respondents.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Wells Fargo Bank, N.A.'s Notice of Debtor's Request for Forbearance Due to the COVID-19 Pandemic was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,
Philadelphia, PA 19107

Angela Lynn Baglanzis, Attorney for Victor H. Maia, Obermayer Rebmann Maxwell & Hippel LLP, Centre Square West, 1500 Market Street, Suite 3400, Philadelphia, PA 19102,
angela.baglanzis@obermayer.com

Edmond M. George, Attorney for Victor H. Maia, Obermayer Rebmann Maxwell & Hippel, LLP, Centre Square West, 1500 Market Street, Suite 3400, Philadelphia, PA 19102,
edmond.george@obermayer.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on May 15, 2020:

Victor H. Maia and Celeste Maia, 79 Redwood Drive, Richboro, PA 18954

Victor H. Maia and Celeste Maia, 79 Redwood Drive, Northampton, PA 18067

PNC Bank National Association, 2730 Liberty Avenue, Pittsburgh, PA 15222

DATE: May 15, 2020

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

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